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September 24, 2021

VIA ECF

The Honorable André M. Espinosa
Martin Luther King Jr. Courthouse
50 Walnut Street
Room 2037, Courtroom 2D
Newark, NJ 07102

RE: CAMPANIELLO-CASON et al v. O'REILLY, (2:20-cv-03381-MCA-AME)

Dear Judge Espinosa:

We write in response to your September 8, 2021 Order (Docket Entry 42) directing the parties to submit a joint letter itemizing the issues, if any, including settlement to be discussed at the upcoming conference call. Opposing counsel consents to this joint letter. Neither party believes there are pending issues to be addressed prior to trial, with the exception of motions *in limine*. The parties have completed discovery. Plaintiff has made a settlement offer that Defendant has rejected. We are requesting that a new order be issued preparing this case to be made trial ready.

Respectfully submitted,
s/Victor Monterrosa Jr., Esq.
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